

BEN ECKSTEIN

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2021 MAY 11 AM 8:59

FILED
BY *[Signature]**Counsel for Plaintiff*MONTANA EIGHTH JUDICIAL DISTRICT COURT,
CASCADE COUNTY

STATE OF MONTANA, Plaintiff, v. PATRICK LAWRENCE VANWORTH, Defendant.	Cause No. CDC - 21 326 INFORMATION
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Ben Eckstein, Special Deputy Cascade County Attorney, alleges that the Defendant, Patrick Lawrence Vanworth (the "**Defendant**"), has committed the following offense in Cascade County:

Criminal Insurance Fraud, a felony, as specified in Mont. Code Ann. § 33-1-1504(1)(a): On or about the period of time between March 13, 2019, and April 5, 2019, the Defendant, for the purpose of obtaining money or benefits, presented to Liberty Mutual Insurance Company or its subsidiaries or affiliates (collectively, "**Liberty Mutual**") written and oral statements, including computer-generated documents, containing false, incomplete, or misleading information material to a claim for payment or other benefit from Liberty Mutual. The Defendant did so through a series of acts or omissions resulting in a pecuniary loss to Liberty Mutual of at least \$1,500, motivated by a purpose to accomplish a single criminal objective or by a common purpose or plan that resulted in the repeated commission of the same

offense or that affects the same person or the same persons or the property of the same person or persons. Specifically, the Defendant submitted to Liberty Mutual on or about March 13, 2019, and on or about April 5, 2019, two false invoices showing that the Defendant or the Defendant's husband had been charged for or paid for pet boarding services in the amounts of \$691 and \$1,382, respectively, when in fact the Defendant and the Defendant's husband had not been charged for or paid for pet boarding services.

Because this offense involved a common scheme as defined in Mont. Code Ann. § 45-2-101, this offense is punishable by imprisonment in the state prison for a term of not more than 10 years, or by a fine of not more than \$50,000, or both. Mont. Code Ann. § 33-1-1504(2)(c).

WITNESSES

A list of the possible witnesses for the State now known to the prosecution is as follows:

1. Neil Brunett, Investigator, Commissioner of Securities and Insurance;
2. Traci Johnson, Liberty Mutual, Spokane, WA;
3. Katy Duncan, Happy Tails Lodge, Co., Great Falls, MT;
4. Steven Young, Happy Tails Lodge, Co., Great Falls, MT

DATED this 5th day of May, 2021.

/s/ Ben Eckstein
BEN ECKSTEIN
Legal Counsel
Special Deputy Cascade County Attorney